

1 Gregory G. Spaulding, Esq. (SB# 106606)
2 Terry S. Sterling, Esq. (SB# 106379)
3 SPAULDING McCULLOUGH & TANSIL LLP
3550 Round Barn Boulevard, Suite 306
3 P.O. Box 1867
4 Santa Rosa, CA 95402
Telephone: (707) 524-1900
Facsimile: (707) 524-1906

5 Attorneys for Defendant COUNTY OF SONOMA
6
7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 BETTY GAIL IRWIN, surviving spouse heir-at-
11 law and personal representative of William
Martin Irwin, deceased,

12 Plaintiff,

13 vs.

14 COUNTY OF SONOMA, and DOES 1-20,

15 Defendants,

16 Case No.: C 06-02356 CW

17 STIPULATION AND ORDER
18 CONTINUING DEADLINE FOR ENE

19 This Stipulation is entered into by and between plaintiff BETTY GAIL IRWIN and
20 defendant COUNTY OF SONOMA with reference to the following facts:

21 At the September 8, 2006 Case Management Conference before the Honorable Claudia
22 Wilkins, plaintiff's counsel advised the Court that new defendants were going to be added to this
23 case. Although Judge Wilkins set a November 30, 2006 deadline for the parties to conduct Early
24 Neutral Evaluation, she advised counsel that the parties could request a continuance of that deadline
25 by stipulation, if new parties were added.

26 Plaintiff has submitted to this Court a Stipulation and Order Substituting Parties, seeking
27 leave to substitute California Forensic Medical Group and Sutter Medical Center as defendants, in
28 place of Does 1 and 2. Assuming that the Court approves the Stipulation, the new parties will need
to be served, to appear, to join in the stipulation for ADR and to make their Initial Disclosures
before a productive Early Neutral Evaluation can be held. For that reason, counsel for the parties

1 agree that the November 30, 2006 deadline for Early Neutral Evaluation should be continued for 90
2 days.

3 IT IS HEREBY STIPULATED by and between the parties hereto that the November 30,
4 2006 deadline for Early Neutral Evaluation should be continued to February 28, 2007.

5 DATED: September 21, 2006

LAW OFFICES OF RICHARD SAX
6 Attorneys for Plaintiff BETTY GAIL IRWIN

7 By: /s/ Richard Sax
Richard Sax

8 DATED: September 21, 2006

9 SPAULDING McCULLOUGH & TANSIL LLP
10 Attorneys for Defendant COUNTY OF SONOMA

11 By: /s/ Terry S. Sterling
Terry S. Sterling

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 ORDER
2

3 This Court, having read and considered the Stipulation set forth above, and good cause
4 appearing therefore,

5 IT IS HEREBY ORDERED that the November 30, 2006 deadline for Early Neutral
Evaluation is continued to February 28, 2007.

6 9/27

/s/ CLAUDIA WILKEN

7 DATED: _____, 2006

8 UNITED STATES DISTRICT JUDGE

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28